

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

TUSHBABY, INC.,

Plaintiff,

Case No. 1:24-cv-21136-LEIBOWITZ

v.

ZOOYEE, a Foreign Corporation,

Defendant.

/

PLAINTIFF'S MOTION FOR RELEASE OF BOND

On May 29, 2025, the Court issued a Final Judgment and Permanent Injunction in this case against Defendant ZOOYEE. [ECF No. 139]. Therein, at Plaintiff Tushbaby, Inc.'s request, the Court ordered the Clerk to release the \$5,000 bond Tushbaby posted in this case.

After consultation with the Clerk's Office, it is the undersigned's understanding that the bond cannot be released because the final judgment does not account for accrued interest. In lieu of issuing an amended final judgment simply to resolve the matter of the posted bond, Tushbaby requests that the Court issue the attached proposed order to release the bond with clarifying language for the Clerk.

WHEREFORE, Plaintiff Tushbaby, Inc. respectfully requests that the Court issue the attached Order requiring the Clerk to return the bond posted in this case, plus accrued interest.

Dated: June 5, 2025.

Respectfully submitted,

James M. Slater

James M. Slater (FBN 111779)

ESCA Legal LLC

9000 Dadeland Blvd. #1500

Miami, FL 33156

Tel.: (305) 523-9023

james@esca.legal

Attorneys for Plaintiff Tushbaby, Inc.